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REMARKS

This application has been carefully reviewed in light of the final Office Action dated July 31, 2007. As indicated above, claims 11 and 24 have been cancelled herein, without prejudice or disclaimer of subject matter, and claim 25 has been added. Claims 1, 3 to 10, 13, 14, 22, 23 and 25 remain in the application, of which claims 1, 13, 23 and 25 are the independent claims herein. Reconsideration and further examination are respectfully requested.

In the Office Action, claims 1, 3, 8, 10, 11, 13, 22 and 23 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,829,746 ("Schwerdtfeger") in view of U.S. Patent No. 7,146,614 ("Nikols") in view of U.S. Patent No. 6,961,773 ("Hartman"); claims 4 and 5 were rejected over Schwerdtfeger, Nikols and Hartman in view of "XML Events: An Events Syntax for XML" ("McCarron"); claim 6 was rejected under 35 U.S.C. § 103(a) over Schwerdtfeger, Nikols and Hartman in view of "HTML: The Definitive Guide" ("Musciano"); claim 7 was rejected under 35 U.S.C. § 103(a) over Schwerdtfeger, Nikols and Hartman in view of U.S. Patent No. 6,434,578 ("McCauley"); claims 9 and 14 were rejected under 35 U.S.C. § 103(a) over Schwerdtfeger, Nikols and Hartman in view of U.S. Patent application Publication No. 2003/0011631 ("Halahmi"); and claim 24 was rejected under 35 U.S.C. § 103(a) over Schwerdtfeger in view of Nikols and Hartman. In response, the independent claims have been amended to further clarify several additional features. Reconsideration and further examination are therefore respectfully requested.

According to the present disclosure, a description is generated of an event and an element in a source document using a generic, device-independent document description markup language, the event representing a form submission user interaction with the element, and meta-information about a structure of the source document is associated with the generically described event. The generic description of the event and the element is transformed into markup language specific representations of the event and the element, respectively, the transforming being controlled at least in part by the associated meta-information, and at least one of the markup language specific representations is sent to a browser running on a client device. From the client device the generically described event coded as at least one HTTP-request parameter based on the form submission user interaction occurring at the browser is received, the at least one HTTP-

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request parameter including an event name and an event value derived from attributes of the generic description defining a resource processing the event and a sequence of the event, and a process is invoked based on the received at least one HTTP-request parameter.

Referring to particular claim language, independent claim 1 recites a method including generating a description of an event and an element in a source document using a generic, device-independent document description markup language, the event representing a form submission user interaction with the element, and associating meta-information about a structure of the source document with the generically described event. Additionally, the method includes transforming the generic description of the event and the element into markup language specific representations of the event and the element, respectively, the transforming being controlled at least in part by the associated meta-information, and sending at least one of the markup language specific representations to a browser running on a client device. The method further includes receiving from the client device the generically described event coded as at least one HTTP-request parameter based on the form submission user interaction occurring at the browser, the at least one HTTP-request parameter including an event name and an event value derived from attributes of the generic description defining a resource processing the event and a sequence of the event, and invoking a process based on the received at least one HTTP-request parameter.

Independent claims 13, 23 and 25 recite similar features, in the context of an apparatus, a medium, and another method.

The applied references are not seen to disclose, teach or to suggest the foregoing features recited by the independent claims. In particular, neither Schwerdtfeger, Nikols, nor Hartman, either alone or in combination (assuming, *arguendo*, that such a combination were possible) are seen to disclose at least the features that *i)* a description is generated of an event and an element in a source document using a generic, device-independent document description *markup* language, the event representing a form submission user interaction with the element, *ii)* the generic description of the event *and the element* is transformed into markup language specific representations of the event *and the element*, respectively, the transforming being controlled at least in part by the associated meta-information, or *ii)* the generically described event coded as at least one HTTP-request parameter based on the form submission user interaction occurring at the browser is received from the client device, the at least one HTTP-request parameter including an

event name and an event value derived from attributes of the generic description *defining a resource processing the event and a sequence of the event.*

Schwerdtfeger describes an electronic document delivery system coupled to a transcoder proxy, which ostensibly allows a client machine with limited resources to provide interactive aspects of electronic documents for a physically challenged user. *See* Schwerdtfeger, Abstract. Initially, the Examiner's acknowledgement that Schwerdtfeger does not disclose the transforming, sending, receiving or invoking operations recited by the claims is acknowledged with appreciation.

In Schwerdtfeger, an input electronic document 12 includes an element with JAVASCRIPT code that displays data when a mouseOver event occurs. *See* Schwerdtfeger, col. 9, ll. 38 to 41. Initially, since JAVASCRIPT is not believed to be a generic, device-independent document description *markup language*, Schwerdtfeger consequently is not seen to transform this JAVASCRIPT code from the electronic document 12 to a markup language specific representation of the JAVASCRIPT code in the markup-language specific "script."

At most, the transformed, markup-language specific "script" produced by Schwerdtfeger includes the element and a "code value" associated with the event, where the code value merely allows a JAVASCRIPT engine to access the pre-transcoded JAVASCRIPT code in the input electronic document 12 (and not, specifically, in the script itself). *See* Schwerdtfeger, col. 9, ll 46 to 67. This code value is further not seen, however, to define a resource to process the event, or a sequence of the event, as recited by the independent claims. Moreover, nothing in Schwerdtfeger is believed to allude to an event representing a form submission user interaction, or receiving a generically described event based on the occurrence of a form submission user interaction.

Accordingly, Schwerdtfeger is not seen to disclose at least the features that *i)* a description is generated of an event and an element in a source document using a generic, device-independent document description markup language, the event representing a form submission user interaction with the element, *ii)* the generic description of the event and the element is transformed into markup language specific representations of the event and the element, respectively, the transforming being controlled at least in part by the associated meta-information, or *ii)* the generically described event coded as at least one HTTP-request parameter

based on the form submission user interaction occurring at the browser is received from the client device, the at least one HTTP-request parameter including an event name and an event value derived from attributes of the generic description defining a resource processing the event and a sequence of the event.

Nikols is not seen to remedy the deficiencies of Schwerdtfeger. In particular, Nikols describes an application integration driver infrastructure for facilitating the use of a distributed directory running on a computer network. *See* Nikols, Abstract. When an event (formatted as Novell Directory Services (NDS) data) is generated, an XML generator converts the NDS data to XML. *See* Nikols, col. 6, ll. 4 to 18. A transformation processor transforms the format of the XML data to one appropriate for an application 102 (i.e., an application data format). *See* Nikols, col. 6, ll. 26 to 30. Nothing in Nikols, however, is seen to disclose the feature that the transformation of the XML data to application data format data is controlled by meta information associated with the generally described event. Furthermore, Nikols is similarly silent on the transformation of the generic description of an *element* into a markup language specific representation of the *element*, where the transforming is controlled by the associated meta-information.

Hartman is not seen to remedy the deficiencies of Schwerdtfeger and Nikols. Specifically, Hartman describes a managed services platform, in which relationships with application service providers are managed over a wide area network such as the Internet. *See* Hartman, Abstract. As Hartman was cited by the Office Action merely with regard to the receiving operation, the Applicants note that the cited passages of this reference are seen to be wholly silent with regard to the newly clarified features that the generically described event coded as at least one HTTP-request parameter *based on the form submission user interaction occurring at the browser* is received from the client device, the at least one HTTP-request parameter including an event name and an event value derived from attributes of the generic description *defining a resource processing the event and a sequence of the event.*

For these and other reasons, Nikols and Hartman are also not believed to disclose at least the features that *i)* a description is generated of an event and an element in a source document using a generic, device-independent document description markup language, the event representing a form submission user interaction with the element, *ii)* the generic description of

the event and the element is transformed into markup language specific representations of the event and the element, respectively, the transforming being controlled at least in part by the associated meta-information, or *ii)* the generically described event coded as at least one HTTP-request parameter based on the form submission user interaction occurring at the browser is received from the client device, the at least one HTTP-request parameter including an event name and an event value derived from attributes of the generic description defining a resource processing the event and a sequence of the event. Accordingly, the combination of references does not support a prima facie case of obviousness.

Accordingly, based on the foregoing amendments and remarks, independent claims 1, 13, 23 and 24 are believed to be allowable over the applied references. The remaining claims in the application are each dependent on the independent claim, and are thus believed to be allowable for at least the same reasons. Because each claim is deemed to define additional aspects of the disclosure, however, the individual consideration of each claim on its own merits is respectfully requested.

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, objection, issue, or comment, including the Office Action's characterizations of the references, does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment or cancellation of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment or cancellation. Since the amendments made herein have been made solely in an effort to expedite advancement of this case, the Applicants reserve the right to prosecute the rejected claims in further prosecution of this or related applications.

No other matters being raised, it is believed that the entire application is fully in condition for allowance and such action is courteously solicited.

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No fees are believed to be due at this time. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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